

R E M A R K S

Careful review and examination of the subject application are noted and appreciated.

SUPPORT FOR CLAIM AMENDMENTS

Support for the claim amendments can be found in the drawings as originally filed, for example, in FIG. 27, and in the specification as originally filed, for example, on page 8, lines 2-23, on page 9, line 9 through page 10, line 24, on page 14, lines 1-10, and on page 30, lines 3-15. As such, no new matter has been introduced.

CLAIM REJECTIONS UNDER 35 U.S.C. §103

The rejection of claims 1, 2, 4-16 and 18-23 under 35 U.S.C. §103(a) as being unpatentable over Yasuki et al. (U.S. Patent No. 5,712,689; hereinafter Yasuki) in view of Cahill, III et al. (U.S. Patent No. 5,784,047; hereinafter Cahill) has been obviated by appropriate amendment and should be withdrawn.

The rejection of claims 3 and 17 under 35 U.S.C. §103(a) as being unpatentable over Yasuki in view of Cahill, and further in view of Malinowski et al. (U.S. Patent No. 5,574,572; hereinafter Malinowski) has been obviated by appropriate amendment and should be withdrawn.

Yasuki is directed to a digital television set (Title of Yasuki). Cahill is directed to a method and apparatus for a

display scaler (Title of Cahill). Malinowski is directed to a video scaling method and device (Title of Malinowski).

In contrast to the cited references, the presently claimed invention (claim 1) provides an address generator circuit configured to generate one or more first control signals, wherein the address generator comprises a finite state machine configured to allow multiple luma and multiple chroma picture requests to follow in sequence and the finite state machine provides (i) an idle after chroma state configured to move to a chroma state in response to a first predetermined condition and (ii) an idle after luma state configured to move to a luma state in response to a second predetermined condition. Claims 15 and 16 include similar limitations. Yasuki and Cahill do not teach or suggest all the elements of the presently claimed invention as required by MPEP §2142. As such, the presently claimed invention is fully patentable over the cited references and the rejections should be withdrawn.

Specifically, the Office Action admits that "Cahill, III et al. does not teach the limitation of a finite state machine configured to allow multiple luma and multiple chroma requests to follow in sequence." Yasuki does not cure the deficiency of Cahill. Assuming, *arguendo*, the state machine 385 in FIG. 5 of Yasuki is similar to the presently claimed finite state machine (as suggested on page 5, line 11 through page 6, line 7 of the Office Action and for which Applicant's representative does not necessarily agree), Yasuki does not teach or suggest the state

machine 385 provides (i) an idle after chroma state configured to move to a chroma state in response to a first predetermined condition and (ii) an idle after luma state configured to move to a luma state in response to a second predetermined condition, as presently claimed. In particular, the only statement regarding the state machine 385 contained in Yasuki reads:

The bus controller 338 is composed of a bus control section 381 which checks the signal of the data transfer, a bus arbiter section 382 which controls the competition of the bus with CPU 337, an interrupt handling section 383, DMA (direct memory access device) 384 used for the data transfer, and **a state machine 385 which controls the bus controller 338 and the overall system** (Column 7, lines 46-52 of Yasuki, emphasis added).

Yasuki is silent regarding what specific states are provided by the state machine 385. Since Yasuki is silent regarding the state machine 385 providing (i) an idle after chroma state configured to move to a chroma state in response to a first predetermined condition and (ii) an idle after luma state configured to move to a luma state in response to a second predetermined condition as presently claimed, it follows that Yasuki does not teach or suggest a finite state machine as presently claimed. Therefore, Yasuki and Cahill do not teach or suggest each and every element of the presently claimed invention. As such, the presently claimed invention is fully patentable over the cited references and the rejections should be withdrawn.

Furthermore, the Office Action fails to provide any objective evidence or a convincing line of reasoning why a person

of ordinary skill in the field of the invention would consider the switch 459 in FIG. 12 of Yasuki as being either (i) an idle after luma state or (ii) an idle after chroma state of a finite state machine, as presently claimed (see page 16, line 16 through page 17, line 11 of the Office Action). Therefore, the Office Action does not appear to have met the Office's burden of factually establishing that a combination of references teaches or suggests each and every element of the presently claimed invention (see MPEP §2143). As such, the presently claimed invention is fully patentable over the cited references and the rejections should be withdrawn.

Claims 2-14 and 17-22 depend, directly or indirectly, from either claim 1 or claim 16 which are believed to be allowable. As such, the presently claimed invention is fully patentable over the cited references and the rejection should be withdrawn.

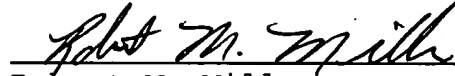
Accordingly, the present application is in condition for allowance. Early and favorable action by the Examiner is respectfully solicited.

The Examiner is respectfully invited to call the Applicants' representative at 586-498-0670 should it be deemed beneficial to further advance prosecution of the application.

If any additional fees are due, please charge Deposit
Account No. 12-2252.

Respectfully submitted,

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A handwritten signature in cursive script, reading "Robert M. Miller", is written over a horizontal line.

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